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*Interim Co-Lead Consumer Class Counsel*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, *et al.*,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF SHANA E.  
SCARLETT IN SUPPORT OF  
CONSUMER PLAINTIFFS'  
OPPOSITION TO DEFENDANT META  
PLATFORMS, INC.'S MOTION TO  
EXCLUDE EXPERT TESTIMONY AND  
OPINIONS OF NICHOLAS  
ECONOMIDES AND SARAH LAMDAN**

Hon. James Donato

This Document Relates To:

*All Consumer Actions*

I, Shana E. Scarlett, declare under penalty of perjury as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California. I am a partner with the law firm Hagens Berman Sobol Shapiro LLP (“Hagens Berman”), one of the attorneys of record for Consumer Plaintiffs in the above-titled action. I submit this declaration in support of Consumer Plaintiffs’ renewed motion for class certification.

2. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

3. Attached hereto are true and correct copies of the following Exhibits:

<b><u>Ex. No.</u></b>	<b><u>Description of Exhibit</u></b>	<b><u>Provisionally Filed Under Seal</u></b>
1	Expert Report of Dr. Nicholas Economides, dated January 12, 2024.	
2	Excerpts of the Videotaped Virtual Deposition of Nichaolas Economides, Ph.D., taken in the above-referenced action on September 14, 2023	Yes
3	PALM-003556066, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
4	Expert Rebuttal Report of Dr. Nicholas Economides, dated February 9, 2024.	Yes
5	Excerpts of the Videotaped Deposition of Maximillian Klein, M.D., taken in the above-referenced action on May 31, 2023 by Tiffany M. Pietrzyk, CSR, RPR, CRR.	Yes
6	Excerpts from the Videotaped Deposition of Rachel Banks Kupcho, taken in the above-referenced action on May 22, 2023 by Alison C. Webster, CSR-6266, RPR, RMR, CRR, RDR	Yes
7	Excerpts of the Videotaped Deposition of Sarah Grabert (Vol. 1), taken in the above-referenced action on April 24, 2023 by Tiffany M. Pietrzyk, CSR, RPR, CRR.	Yes
8	Excerpts of the Videotaped Deposition of Sarah Grabert (Vol. 2), taken in the above-referenced action on April 25, 2023 by Tiffany M. Pietrzyk, CSR, RPR, CRR.	Yes
9	Excerpts of the Video Deposition via Zoom of Dr. Catherine Tucker, taken in the above-referenced action on September 7, 2023 by Julie Brown, RPR, CCR.	Yes
10	Abridged Expert Declaration of Nicholas Economides, Ph.D. in Support of Renewed Motion to Certify Consumer Class, dated May 24, 2024.	Yes

<b><u>Ex. No.</u></b>	<b><u>Description of Exhibit</u></b>	<b><u>Provisionally Filed Under Seal</u></b>
11	Excerpts of the Videotaped Deposition of Nicholas Economides, Ph.D., taken in the above-referenced action on March 15, 2024 by Theresa A. Vorkapic, CSR, RMR, CRR, RPR.	Yes
12	Excerpts of the 30(b)(1) Video Deposition via Zoom of Brian Action, taken in the above-referenced action on April 12, 2023 by Julie Brown, RPR, CCR.	Yes
13	Document Bates-numbered PALM-013176674-77, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
14	Expert Merits Report of Sarah Lamdan, dated January 12, 2024.	Yes
15	Expert Merits Rebuttal Report of Sarah Lamdan, dated February 9, 2024.	Yes
16	Document Bates-numbered PALM-000277709-716, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
17	Document Bates-numbered PALM-FTC-00202933-941, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
18	Document Bates-numbered PALM-000277701-708, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
19	Document Bates-numbered PALM-000277690-7700, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
20	Document Bates-numbered PALM-001534880-890, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
21	Document Bates-numbered PALM-FTC-00909820-24, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
22	Document Bates-numbered PALM-ADI-0000682545, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
23	Document Bates-numbered PALM-010644865, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes

<b><u>Ex. No.</u></b>	<b><u>Description of Exhibit</u></b>	<b><u>Provisionally Filed Under Seal</u></b>
24	Document Bates-numbered PALM-002420657-661, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
25	document Bates-numbered PALM-006489548, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
26	Document Bates-numbered PALM-002370637, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
27	Document Bates-numbered PALM-FTC-00199013-16, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
28	Excerpts of the Video Deposition via Zoom of D. Scott Baser, taken in the above-referenced action on June 14, 2023 by Angela Smith McGalliard, CCR, RPR, CRR, and Notary Public.	Yes
29	Document Bates-numbered PALM-014211416-424, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
30	Document Bates-numbered PALM-007621636, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
31	Document Bates-numbered PALM-006604510-512, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
32	Document Bates-numbered PALM-005474710-712, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
33	Document Bates-numbered PALM-004235532, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
34	Document Bates-numbered PALM-010350030-30_0003, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
35	Document Bates-numbered PALM-010595432, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
36	Document Bates-numbered PALM-006489679-9715, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
37	Document Bates-numbered PALM-006489549, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes

<u>Ex. No.</u>	<u>Description of Exhibit</u>	<u>Provisionally Filed Under Seal</u>
38	Document Bates-numbered PALM-006002495, produced in the above-referenced action by Defendant Meta Platforms, Inc.	Yes
39	Excerpts from the Videotaped Deposition of Sarah Lamdan, taken in the above-referenced action on March 21, 2024 by Theresa A. Vorkapic, CSR, RMR, CRR, RPR.	Yes
40	Excerpts of the Merits Expert Report of Joseph Farrell, D.Phil., dated January 12, 2024.	Yes

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 12th day of May 2025 at Berkeley, California.

By /s/ Shana E. Scarlett  
SHANA E. SCARLETT